

Application No. 10/072,353

**REMARKS**

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1, 15 and 21 have been amended to specify a "route distribution rule" for determining distribution of VPN routes within the network. The route distribution rules constrains or determines distribution of VPN within the network so that only sites that are members of the VPN can learn or have access to those routes. The amendments are intended to clarify what was meant by "routing rule" are not intended to narrow the scope of the claims. The preamble in claim 1 is also amended to explain that the contemplated VPN is of a type that utilizes constrained distribution of routes, in order to give better context. An example of such a VPN is a BGP/MPLS VPN. The IETF's RFC 2547bis, a copy of which was previously submitted by information disclosure statement, describes how this particular VPN type uses Border Gateway Protocol (BGP) to distribute VPN routes to VPN sites. Claim 15 is further amended to require that a route filtering rule be generated in response to the addition of a site to a VPN component through the graphical user interface.

Dependent claims have been amended solely for consistency with the new terminology. The scope of each of these claims is not intended to be narrowed by the amendments.

Claim 16 has been cancelled. Claim 28 is new and depends on claim 1.

**Claim Objections**

It is respectfully submitted that claims 5 and 6, and claims 9 and 10, are not substantial duplicates. The difference lies in the underlined text of portions of the claims stated below

Claim 5 states:

generating, for a site of said plurality of sites, an import rule for accepting route information, in response to said site being a hub of a hub-spoke VPN component, received from any site of said plurality of sites which is a member of said hub-spoke VPN component.

Claim 6 states:

generating, for a site of said plurality of sites, an import rule for accepting route information, in response to said site being a spoke of a hub-spoke VPN component, received from any site of said plurality of sites which is a hub of said hub-spoke VPN component.

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The same difference underlies claims 9 and 10. Claim 9 requires generating an export rule in response to a site being a hub, and claim 10 requires generating an export rule in response to a site being a spoke of a hub and spoke VPN.

Withdrawal of the objections is respectfully requested.

Rejections of Claims 1-14, and 21-22

It is respectfully submitted that U.S. Patent No. 6,944,183 of Iyer et al. cannot anticipate claims 1 and 21, and their respective dependent claims 14 and 22. Therefore, this rejection is traversed for at least this reason.

Claim 1 as originally submitted required, "automatically generating at least one routing rule for each site of said VPN based at least in part on said defined relationship." Independent claim 21 requires, "automatically generating at least one routing rule for each site of said plurality of sites based at least in part on a membership of said respective site." The amendments do not change these requirements. The examiner makes no mention in his remarks of automatically generating a routing rule. He states only that Iyer et al. teach assigning a site to policies, including RIP routing policy, to a plurality of VPN sites. A long section of Iyer et al, starting with line 1 in column 4 and continuing to line 28 in column 5, is cited in support of this proposition. Assuming that this contention is correct (applicant is not admitting that it is correct), it is respectfully submitted that Iyer et al. contemplate at best only assigning previously established policies to those sites. There is no automatic generation of a routing policy in response to a defining a relationship between VPN sites using a graphical interface.

Furthermore, Iyer et al. plainly does not contemplate rules that determine distribution of routes between sites. Indeed, it does not appear to contemplate the type of VPN called for in the preamble of the claim.

Therefore, Iyer et al. cannot anticipate claims 1 and 21, or any claims depending from them for at least these reasons. This rejection of the original claims were in error for at least this reason. Any amendments made to the claim are not being made in response to the rejection. Because the rejections of dependent claims 2-14 are premised on this same error, those rejections are in error for at least the same reason.

Rejections of claims 15-20

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Independent claims 15 requires: "wherein dropping of said at least one site on a graphical representation of said at least one VPN component causes said at least one site to be displayed in said display area and to become a member of said VPN component." However, it is respectfully this element cannot be met by Arquie and Giniger et al., standing alone or combined. First, Arquie is concerned solely with routing lines between objects on a graphical interface so that they do not interest other objects, not with generating routes in a network. In other words, it relates solely to laying out a graph. Second, neither it nor Giniger's "management server" concern adding to a site to membership of a VPN in a network by interacting with a graphical interface. Third, there is no indication of dragging a representation of a site to a representation of a VPN component to generate membership in the VPN. Sites are not merely being added to a network, as suggested by the examiner's stated motivation. The sites are already part of the network. They are being added to membership in a virtual private network within the network. Finally, the motivation to combine the two is too generalized to support the combination.

Therefore, the rejection of original claim 15 is error. Because the rejections of claims 16-20 are also based on this combination, they too are in error for at least the same reason.

The amended claim 15, as well as claims depending on it, are allowable for at least the reason that the combination of Arquie, Giniger et al. and Iyer do not disclose generating VPN membership and route distribution rules in response to dragging and dropping a representation of a site of the network onto a representation of a VPN component.

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**CONCLUSION**

In light of the arguments set forth above, Applicants respectfully submit that the Application is now in allowable form. Accordingly, Applicants respectfully request consideration and allowance of the currently pending claims.

Applicant hereby authorizes the Commissioner to charge any fees, other than issue fees, that may be required by this paper to Deposit Account No. 07-0153. The Examiner is respectfully requested to call Applicant's Attorney for any reasons that would advance the current application to issue. Please reference Attorney Docket No. 131105.1004.

Dated: \_\_\_\_\_

Respectfully submitted,

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